

FEDERAL COMMUNICATIONS COMMISSION
Office of Engineering and Technology

March 4, 2005

RECEIVED

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

MAR -- 4 2005

Federal Communications Commission
Office of the Secretary

Re: *Notice of Ex Parte Presentation*: ET Docket No. 04-35

Dear Ms. Dortch:

As stated in a Notice of Ex Parte Presentation filed on February 11, 2005 by Syniverse Technologies, Inc. ("Syniverse"), David Robinson and Michael Stewart of Syniverse and Legal Counsel for Syniverse, Lawrence J. Movshin and L. Charles Keller of Wilkinson Barker Knauer, LLP, met with Jeffery Goldthorp, Chief of the Network Technology Division ("NTD"), Office of Engineering and Technology, Kent Nilsson, Special Counsel and Deputy Chief, NTD, and Whitey Thayer and John Healy of NTD on February 10, 2005. During that meeting, Syniverse discussed its pending petitions for reconsideration and partial stay of the Commission's network outage reporting rules as they relate to disruptions to Signaling System 7 ("SS7") communications. In addition to the disclosures contained in Syniverse's Notice of Ex Parte Presentation of February 11, 2005, NTD provides the following additional information.

At the February 10th meeting, Syniverse stated that some wireless communications providers appear not to understand that they must abide by the SS7 reporting requirements. In response, NTD staff stated that all communications providers (wireline, wireless, *etc.* – see Part 4 of the Rules) are required to report all SS7 outages that meet or exceed the threshold criteria set forth in the rules.

Syniverse further asserted that, as a third-party SS7 communications provider, it does not know the extent to which any particular SS7 outage results in a particular number of blocked or lost calls and that it should not, therefore, be required to report those types of outages. NTD responded that SS7 outages affecting several small communications providers could in the aggregate meet, or exceed, the threshold criteria and therefore must be reported by the SS7 provider. This is so even in situations where each of the affected small communications providers does not experience an outage that meets, or exceeds, the threshold criteria and therefore is not required to file an outage report but which, in the aggregate, would require a report.

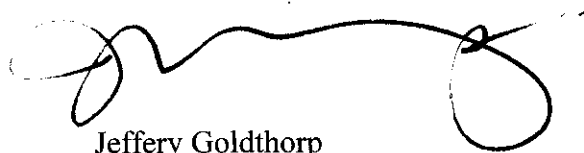
Syniverse also stated that the number of lost MTP messages might not be a good measure of the impact of a SS7 outage, was difficult to measure, and that Syniverse would have to continue its development of a system in order to be able to collect historic lost MTP message data on an hourly basis. NTD responded that data could be developed after outages have been evaluated,

including the assimilation of data from relatively sparse historic data, and that because Syniverse had experienced only one or two reportable outages such data collection and assimilation would be unlikely to constitute a significant burden. Syniverse responded that it had investigated outages that did not meet the lost MTP message threshold for reporting, and that there are a lot of SMS messages which might make the count of lost MTP messages irrelevant in determining whether a reportable outage had occurred. Syniverse also pointed out that, in its efforts to provide prompt reporting of SS7 outages for homeland security purposes, it had concluded that it should rely on historical, rather than prospective, MTP message levels in determining whether or not to report a SS7 outage.

Syniverse added that, instead of counting lost MTP messages, it would rather file an outage report whenever an SSP or SCP was isolated from Syniverse's SS7 network for 30 minutes or more. NTD pointed out that using this alternative could result in Syniverse reporting more outages than under the lost MTP message threshold criteria. Nevertheless, Syniverse stated that it would prefer to rely on its proposed alternative criteria because they would be easier for it to administer than lost MTP messages.

NTD welcomes the filing of comments responsive to Syniverse's suggestions that the isolation of SCPs and databases for at least 30 minutes be included as an outage-reporting criterion and that the isolation of SSPs for at least 30 minutes be accepted as an alternative to the lost MTP message criteria.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffery Goldthorp', with a large, stylized loop at the end.

Jeffery Goldthorp
Chief
Network Technology Division
Office of Engineering and Technology